$FBFG \mid \begin{array}{c} \text{Finkelstein, Blankinship,} \\ \text{Frei-Pearson \& Garber, LLP} \end{array}$ 

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August 14, 2025

## Via ECF

Honorable Edgardo Ramos United States District Court 40 Foley Square, Courtroom 619 New York, NY 10007

Re: Brous et al. v. Eligo Energy, LLC, et al., No. 1:24-cv-1260 (ER)

**Consent Letter Motion for Extension of Time for All Remaining Deadlines** 

Dear Judge Ramos,

Pursuant to Rule 1.E of Your Honor's Individual Practices, Plaintiffs write to request a three-week extension of the remaining deadlines set forth in the July 8, 2025 Civil Case Discovery Plan and Scheduling Order (ECF No. 254). This is the third motion to revise the Scheduling Order.

Plaintiffs seek this request because a family member of one of our experts was diagnosed with a serious medical condition that requires the expert's attention. Defendants consent to Plaintiffs' request for a three-week extension.

The proposed revised civil case discovery plan and scheduling order is attached as Exhibit 1.

The following is the list of the original deadlines and requested new deadlines:

Event	Original Deadline	Requested New Deadline
Service of any further interrogatories,	10/17/2025	11/7/2025
including expert interrogatories		
Service of expert reports	8/22/2025	9/12/2025
Service of rebuttal expert reports	10/10/2025	10/31/2025
Completion of expert depositions	11/14/2025	12/05/2025
Completion of all discovery	11/14/2025	12/05/2025
Moving papers for a motion for class certification	11/7/2025	11/28/2025
Answering papers in opposition to the motion for class certification	12/19/2025	1/9/2026
Reply papers in support of the motion for class certification	1/9/2026	1/30/2026

Thank you for the Court's consideration of this request.

Dated: August 14, 2025 Respectfully submitted,

By: /s/ D. Greg Blankinship

D. Greg Blankinship Daniel J. Martin

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